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May 13, 2012

**BY ECF**

Nicole Argentieri  
Rachel Nash  
Allon Lifshitz  
Assistant United States Attorneys  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

***Re: United States v. Persico, et al., S-4 10 Cr. 147 (SLT)***

Dear Government Counsel:

We are in receipt of your May 13, 2012, which failed to address the following requests:

- (1) We again ask that you identify to whom you refer as "CW#7" in your in limine motion dated May 8, 2012. Without this information, we cannot properly respond to the motion.
- (2) You failed to respond to information requested regarding these individuals:
  - Alan Quattrache
  - Kenneth Geller
  - Barbara Geller

Please do so expeditiously. Additionally, in light of your representation that the following cooperating witnesses are no longer under the government's control, we ask that you provide their last known information:

- Salvatore Miciotta
- Lawrence Mazza
- John Pate
- Carmine Imbreale

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(3) By letter dated April 13, 2012 – one month ago – we requested that you provide the date, time and location of the meeting you claim occurred among Michael Persico, Anthony Preza, Anthony Russo and “another individual” in relation to the conduct charged in Count One, Racketeering Act Twelve, and Counts Four and Five of the indictment. See Affidavit of FBI Agent Chance Adam dated March 30, 2012, at 6-7, ¶ 10. Once again, we have yet to receive a response.

Finally, with respect to your representation regarding draft transcripts of Marcus recordings previously provided, we note that the vast majority of the drafts were so incomplete that they failed to identify even the person speaking, noting for the most part that the speaker was “UM: Unidentified male.” Hence, they have been of little use. Accordingly, we reiterate our request for draft or completed transcripts, in a format that is useful, of the recordings the government actually intends to introduce at trial.

Very truly yours,  
/s/  
Sarita Kedia  
Paul Shechtman

*Attorneys for Michael Persico*